

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
TYLER DIVISION**

Secure Axxess, LLC,

*Plaintiff,*

v.

U.S. Bank National Association, *et al.*,

*Defendants.*

§  
§  
§  
§  
§  
§  
§  
§  
§

**CIVIL ACTION NO. 6:13-CV-717 (LED)**

**JURY TRIAL DEMANDED**

---

Secure Axxess, LLC,

*Plaintiff,*

v.

Ally Bank, *et al.*,

*Defendants.*

§  
§  
§  
§  
§  
§  
§  
§  
§

**CIVIL ACTION NO. 6:13-CV-718 (LED)**

**JURY TRIAL DEMANDED**

---

Secure Axxess, LLC,

*Plaintiff,*

v.

GE Capital Retail Bank, *et al.*,

*Defendants.*

§  
§  
§  
§  
§  
§  
§  
§  
§

**CIVIL ACTION NO. 6:13-CV-720 (LED)**

**JURY TRIAL DEMANDED**

---

Secure Axxess, LLC,

*Plaintiff,*

§  
§  
§  
§

v.	§	CIVIL ACTION NO. 6:13-CV-721 (LED)
	§	
Nationwide Bank, <i>et al.</i> ,	§	JURY TRIAL DEMANDED
	§	
<i>Defendants.</i>	§	

---

Secure Axxess, LLC,	§	
	§	
<i>Plaintiff,</i>	§	
	§	
v.	§	CIVIL ACTION NO. 6:13-CV-722 (LED)
	§	
PNC National Association, <i>et al.</i> ,	§	JURY TRIAL DEMANDED
	§	
<i>Defendants.</i>	§	

---

Secure Axxess, LLC,	§	
	§	
<i>Plaintiff,</i>	§	
	§	
v.	§	CIVIL ACTION NO. 6:13-CV-723 (LED)
	§	
Santander Bank, National Association	§	JURY TRIAL DEMANDED
f/k/a Sovereign Bank, National Association	§	
	§	
<i>Defendants.</i>	§	

---

Secure Axxess, LLC,	§	
	§	
<i>Plaintiff,</i>	§	
	§	
v.	§	CIVIL ACTION NO. 6:13-CV-724 (LED)
	§	
Vanguard Group, Inc., <i>et al.</i> ,	§	JURY TRIAL DEMANDED
	§	
<i>Defendants.</i>	§	

---

Secure Axxess, LLC,	§
	§
<i>Plaintiff,</i>	§

---

v.

Bank of the West,

*Defendants.*

§  
§  
§  
§  
§  
§

**CIVIL ACTION NO. 6:13-CV-779 (LED)**

**JURY TRIAL DEMANDED**

---

---

Secure Axxess, LLC,

*Plaintiff,*

v.

Cadence Bank, National Association,

*Defendants.*

§  
§  
§  
§  
§  
§  
§  
§

**CIVIL ACTION NO. 6:13-CV-780 (LED)**

**JURY TRIAL DEMANDED**

---

---

Secure Axxess, LLC,

*Plaintiff,*

v.

Commerce Bank, *et al.*,

*Defendants.*

§  
§  
§  
§  
§  
§  
§  
§

**CIVIL ACTION NO. 6:13-CV-782 (LED)**

**JURY TRIAL DEMANDED**

---

---

Secure Axxess, LLC,

*Plaintiff,*

v.

Raymond James & Associates, *et al.*,

*Defendants.*

§  
§  
§  
§  
§  
§  
§  
§

**CIVIL ACTION NO. 6:13-CV-785 (LED)**

**JURY TRIAL DEMANDED**

---

---

Secure Axxess, LLC,

*Plaintiff,*

§  
§  
§

v.

Trustmark National Bank, *et al.*,

*Defendants.*

§  
§  
§  
§  
§  
§

**CIVIL ACTION NO. 6:13-CV-788 (LED)**

**JURY TRIAL DEMANDED**

---

---

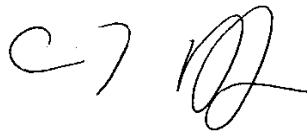
**PLAINTIFF SECURE AXCESS, LLC'S NOTICE OF RESPONSE TO DEFENDANTS'  
MOTIONS TO STAY PROCEEDINGS**

---

---

Because Defendants have filed twelve substantially similar motions,<sup>1</sup> Secure Axcess filed a single response located at Docket No. 28, *Secure Axcess, LLC v. U.S. Bank Nat'l Assoc.*, Case No. 6:13-CV-00717-LED (E.D. Tex. May 1, 2014). This notice directs the Court to arguments and evidence presented in the Response in the *U.S. Bank* case.

Respectfully submitted,



---

<sup>1</sup> *Secure Axcess v. Ally Bank*, 6:13-cv-00718-LED (Dkt. No. 30) (E.D. Tex., filed April 14, 2014); *Secure Axcess v. Bank of the West*, 6:13-cv-00779-LED (Dkt. No. 22) (E.D. Tex., filed April 14, 2014); *Secure Axcess v. Cadence Bank Nat'l Ass'n*, 6:13-cv-00780-LED (Dkt. No. 30) (E.D. Tex., filed April 14, 2014); *Secure Axcess v. Commerce Bank*, 6:13-cv-00782-LED (Dkt. No. 27) (E.D. Tex., filed April 14, 2014); *Secure Axcess v. GE Capital Retail Bank*, 6:13-cv-00720-LED (Dkt. No. 39) (E.D. Tex., filed April 17, 2014); *Secure Axcess v. Nationwide Bank*, 6:13-cv-00721-LED (Dkt. No. 31) (E.D. Tex., filed April 14, 2014); *Secure Axcess v. PNC Bank*, 6:13-cv-00722-LED (Dkt. No. 31) (E.D. Tex., filed April 14, 2014); *Secure Axcess v. Raymond James & Assocs., Inc.*, 6:13-cv-00785-LED (Dkt. No. 27) (E.D. Tex., filed April 23, 2014); *Secure Axcess v. Santander Bank, N.A.*, 6:13-cv-00723-LED (Dkt. No. 23) (E.D. Tex., filed April 14, 2014); *Secure Axcess v. Trustmark Nat'l Bank*, 6:13-cv-00788-LED (Dkt. No. 21) (E.D. Tex., filed April 16, 2014); *Secure Axcess v. U.S. Bank et al*, 6:13-cv-00717-LED (Dkt. No. 24) (E.D. Tex., filed April 14, 2014); *Secure Axcess v. Vanguard Group, Inc.*, 6:13-cv-00724-LED (Dkt. No. 50) (E.D. Tex., filed April 24, 2014).

---

**CHRISTIAN J. HURT**

**DEREK GILLILAND**

STATE BAR NO. 24007239

**EDWARD CHIN**

STATE BAR NO. 50511688

**ANDREW WRIGHT**

STATE BAR NO. 24063927

**KIRK VOSS**

STATE BAR NO. 24075229

**WINN CUTLER**

STATE BAR NO. 24084364

**CHRISTIAN J. HURT**

STATE BAR NO. 24059987

**ROSS LEONOUKAKIS**

STATE BAR NO. 24087915

**NIX PATTERSON & ROACH, L.L.P.**

5215 N. O'Connor Blvd., Suite 1900

Irving, Texas 75039

972.831.1188 (telephone)

972.444.0716 (facsimile)

dgilliland@nixlawfirm.com

edchin@me.com

andrewjwright@me.com

kirkvoss@me.com

winncutler@nixlawfirm.com

christianhurt@nixlawfirm.com

rossl@nixlawfirm.com

**JOHN C. HULL**

STATE BAR NO. 24050791

**NIX PATTERSON & ROACH, L.L.P.**

205 Linda Drive

Daingerfield, Texas 75638

903.645.7333 (telephone)

903.645.5389 (facsimile)

johnhull@nixlawfirm.com

**BRAD SEIDEL**

STATE BAR NO. 24008008

**NIX PATTERSON & ROACH, L.L.P.**

3600 North Capital of Texas Highway

Suite 350

Austin, Texas 78746

512.328.5333 (telephone)

512.328.5335 (facsimile)  
bseidel@npraustin.com

**ERIC M. ALBRITTON**  
STATE BAR NO. 00790215  
**MICHAEL A. BENEFIELD**  
STATE BAR NO. 24073408  
**ALBRITTON LAW FIRM**  
P.O. Box 2649  
Longview, Texas 75606  
903.757.8449 (telephone)  
903.758.7397 (facsimile)  
ema@emafirm.com  
mab@emafirm.com  
drc@emafirm.com

**T. JOHN WARD, JR.**  
STATE BAR NO. 00794818  
**WARD & SMITH LAW FIRM**  
P.O. Box 1231  
Longview, Texas 75606  
903.757.6400 (telephone)  
903.757.2323 (facsimile)  
jw@jwfirm.com

**ANDRÉ J. BAHOU**  
D.C. BAR NO. 483,516 – *admitted pro-hac*  
VICE PRESIDENT AND CHIEF LEGAL OFFICER  
**SECURE AXCESS, LLC**  
555 Republic Drive, Suite 200  
Plano, Texas 75074  
972.767.9856 (telephone)  
aj.bahou@secureaxcess.com

**ATTORNEYS FOR PLAINTIFF**  
**SECURE AXCESS, LLC**

**CERTIFICATE OF SERVICE**

The undersigned certifies that the foregoing document was filed electronically in compliance with Local Rule CV-5(a) and served on all counsel who have consented to electronic service on this the 1st day of May, 2014.

A handwritten signature in black ink, appearing to read "C. J. Nix". The signature is written in a cursive, stylized font.

---

**NIX PATTERSON & ROACH, L.L.P.**